

APPENDIX 1

Unanswered Interrogatories

Interrogatory No. 2, Third Set:

Provide the total number of people, broken down by race and ethnicity, who possessed an unexpired ID as of October 1, 2010, for each of the forms of DPS-issued, SB 14-approved ID, excluding the election identification certificate (*i.e.*, for Texas driver's licenses, personal IDs, and concealed handgun permits). If these numbers are not available for October 1, 2010, provide these numbers for the earliest date after October 1, 2010 for which such numbers are available and state the date for which those numbers are provided.

Interrogatory No. 1, Fourth Set:

For each Texas driver license office, state the office's hours of operation, the number of employees who provide customer service, and, for each week from January 1, 2013 to the present, the average wait time for customers served at the office.

Interrogatory No. 2, Fourth Set:

For each Texas drive license office, identify whether the office has a queuing system and, if it is located on a road or street that is served by municipal, county, or other public transportation, the distance from the nearest stop.

Interrogatory No. 3, Fourth Set:

Identify all individual communications, including but not limited to those from the Texas Department of Public Safety and the office of the Texas Secretary of State, related to notifying the public of the locations, dates, and hours of operation of any temporary or mobile location at which one may apply for an election identification certificate, including the date or dates on which the communication occurred, the language of the communication, and the recipients of those communications.

Interrogatory No. 1, Fifth Set:

Describe the work of the Department of Public Safety (DPS) in issuing the photo ID cards and security access cards described in your response to Interrogatory No. 28 from Plaintiffs' First Set of Interrogatories, including citing the statutory, regulatory, or other source of authority for issuing such cards and describing the procedures for issuing such cards; the information an agency or individual must provide DPS to obtain such cards (including specifying any differences among agencies' cards); the information contained on the cards (including specifying any differences among agencies' cards); which offices issue such cards; how long such cards remain active or valid; and all categories of persons in DPS who

play any role in the process and what each does.

Interrogatory No. 2, Fifth Set:

For the program of counties issuing and/or processing election identification certificates (EICs), describe each category of cost borne by the counties and each category of cost borne by each state agency involved, and state the amount of money spent since June 25, 2013 for each category, by each payor, noting where a cost initially borne by one governmental body was reimbursed by another.

Interrogatory No. 3, Fifth Set:

For the mobile EIC program run by DPS and the Secretary of State's Office, describe each category of cost associated with the program and state the amount of money that was (a) estimated and (b) spent for each category, stating which governmental agency (e.g. DPS, the Secretary of State's Office, the Governor's Office, the Attorney General's Office, or another state agency, entity, or fund) paid each category of cost (initially and ultimately, if there was reimbursement).

Interrogatory No. 4, Fifth Set:

For each county authorized to issue or process EICs, state the date such authorization began (and ended, if applicable) and, for each county and for each month, state the number of inquiries regarding EICs, the number of applications for EICs, the number of EICs issued, the number of EICs denied, and the number of EICs pending approval.

Interrogatory No. 5, Fifth Set:

For each instance after September 1, 2011 in which DPS has exercised discretion to allow an applicant for an original, renewal, or duplicate Texas driver's license, personal ID card, or election identification certificate to prove U.S. citizenship with a document (or set of documents) not specifically listed in Defendants' Response to Interrogatory No. 1 of Plaintiffs' Second Set of Interrogatories, state the date, the office where the application was received, what document or document(s) were accepted as proof of citizenship, and all persons involved in considering or deciding to accept such documents.